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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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In the Matter of
Billed Party Preference
for 0+ InterLATA Calls

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CC Docket No. 92-77

REPLY

MCI Telecommunications Corporation (MCI) hereby replies to the oppositions to the petitions for reconsideration filed in the above-referenced docket by the American Telephone and Telegraph Company (AT&T), Southwestern Bell Telephone Company (SWBT) and Sprint Communications Co. (Sprint). As demonstrated below, the oppositions are without merit and fail to refute the arguments in MCI's Petition for Reconsideration (Petition).

In its Petition, MCI demonstrated that the Commission's Order incorrectly weighed the costs and benefits of the 0+ public domain proposal to find that the proposal should not be adopted. In addition, MCI demonstrated that the Commission failed to address the American Telephone and Telegraph Company's (AT&T's) anticompetitive and discriminatory behavior in providing misleading and incomplete dialing instructions to its CIID card customers; in instructing local exchange carrier (LEC) cardholders to destroy their LEC 0+ cards and replace them with the AT&T CIID card; and in allowing LECs to validate its CIID card, but not other common carriers. Finally, MCI demonstrated that the Commission's remedies, the education requirements imposed on AT&T and the possible payment of compensation for 0+ dialed card calls that inappropriately reach an operator service

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provider (OSP) other than the card issuer, will not eliminate the unwarranted competitive advantage gained by AT&T as a result of its ability to issue a 0+ card or its anticompetitive and misleading marketing practices.

In its opposition, AT&T, for the most part, simply repeats portions of the Commission's Order. This makes for a voluminous, if not persuasive, filing. Significantly, it cannot cure the procedural flaws affecting the Commission's Order specifically, the Commission's failure to address AT&T's anticompetitive and discriminatory practices in connection with its CIID card.

Sprint opposes the petitions for reconsideration because it contends that the 0+ public domain proposal would require interexchange carriers to abandon 10XXX as an access method for calling cards. This is incorrect. As an initial matter, under the 0+ public domain proposal, only carriers that instruct cardholders to dial 0+ would have to either establish a proprietary access number for proprietary cards or provide billing and validation information to all carriers for their cards. In any event, 10XXX is proprietary access and, therefore, carriers would not have to abandon its use.

SWBT opposes the petitions because it contends that the technology required to implement 0+ public domain is not available. This argument also is without merit.^{1/} Under 0+

^{1/} SWBT also alleges that 0+ public domain would require consumers to dial access codes to place collect, third number or LEC calling card calls. SWBT does not explain why it believes this, but it is not the case.


public domain, carriers would be given a choice of either establishing a truly proprietary access method or, if the carrier uses 0+ access, providing billing and validation data to all carriers. The technology clearly exists for carriers to establish proprietary access codes, such as 800 or 950 access, which, in fact, all OSPs are required to do. Accordingly, there is no technological impediment to implementing 0+ public domain.

Based on the foregoing, MCI respectfully requests that the Commission reconsider its decision not to implement the 0+ public domain proposal.

Respectfully submitted,

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Dated: April 1, 1993

CERTIFICATE OF SERVICE

I, Vernell V. Garey, do hereby certify that on this 1st day of April, 1993, copies of the foregoing "**Reply**" in CC Docket No. 92-77 were served by first-class mail, postage prepaid, unless otherwise indicated, upon the parties on the attached list.


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